

EXHIBIT B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Case No. 22-11068 (JTD)

Chapter 11

(Jointly Administered)

Re: D.I. ____

**ORDER (I) AUTHORIZING
AND DIRECTING THE DEBTORS TO RETURN
CERTAIN POSTPETITION CRYPTOCURRENCY DEPOSITS
TO D1 VENTURES AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of D1 Ventures Ltd. (“D1 Ventures”) for the entry of an order (i) authorizing and directing the above-captioned debtors and debtors in possession (collectively, the “Debtors”) to return certain postpetition cryptocurrency deposits to D1 Ventures and (ii) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having the power to enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Motion and opportunity for a hearing thereon was appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The Debtors are authorized and directed to return the Postpetition Deposits to D1 Ventures, net of any gas fees required to effectuate such transfers, within fourteen (14) calendar days of entry of this Order. The Postpetition Deposits shall be returned to cryptocurrency wallet addresses to be provided to the Debtors by D1 Ventures.
3. Notwithstanding anything to the contrary in the Motion, this Order, or any findings announced at the Hearing, nothing in the Motion, this Order, or announced at the Hearing constitutes a finding under the federal securities laws as to whether crypto tokens or transactions involving crypto tokens are securities, and the right of the United States Securities and Exchange Commission to challenge transactions involving crypto tokens on any basis are expressly reserved.
4. The Debtors are authorized and directed to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.